

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EDWARD PITRE,

Plaintiff,

Civ No: 18-CV-5950-(DC)

-against-

NOTICE OF MOTION

THE CITY OF NEW YORK,
FIRE DEPARTMENT OF THE CITY
OF NEW YORK, JAN BORODO, individually,
JOHN FIORENTINO individually, and
JOSEPH M. MASTROPIETRO, individually,

Defendants.
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PLEASE TAKE NOTICE, that upon the annexed Memorandum in support of his motion for reconsideration of this Court's Memorandum & Order, dated January 29, 2024, Plaintiff, Edward Pitre, by his attorneys Derek Smith Law Group, PLLC, pursuant to Rule 60 of the Federal Rules of Civil Procedure and Local Civil Rule 6.3, hereby moves this Court for an order reconsidering and vacating its decision to grant the extreme sanction of dismissal and granting a new trial and such other relief as the Court deems just.

Dated: March 1, 2024
New York, New York

Respectfully submitted,

DEREK SMITH LAW GROUP, PLLC
Attorneys for Claimant

/s/ Seamus Barrett
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